

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)
) Case No.: 19-29400
) Chapter 13
Katrina L. West,) Honorable Judge Carol A. Doyle
Debtor.) Courtroom: 742
)

Notice of Motion for Relief from Stay

To: See Attached Service List

On 12/10/19, at 9:30am, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Deborah L. Thorne or any other judge presiding in Room 742 of the Dirksen Federal Building, located at 219 S. Dearborn, Chicago, IL 60604, and present the **Creditor's Motion for Relief from Stay**.

/s/ Michelle Ronay
Attorney for Movant
Halsted Law Group
22. W. Washington St., Flr 15, Ste 29
Chicago, IL 60602
312-487-1628

Certificate of Service

I, Michelle Ronay, the attorney, state that pursuant to Section II, B, 4 of the Administrative Procedures for the Case Management/Electronic Case Filing System, service of the above-referenced Creditor's Motion for Relief from Stay on all parties identified as Registrants on the appended service list was accomplished through the Court's Electronic Notice for Registrants and, as to all other parties on the appended services list, I caused a copy to be sent to the address(es) indicated before the hour of 5:00 p.m. on 11/22/19.

/s/ Michelle Ronay
Michelle Ronay

Service List

Registrants Served Through the Court's Electronic Notice for Registrants:

Patrick S. Layng
USTPRegion11.ES.ECF@usdoj.gov

Tom Vaughn
ecf@tvch13.net

David Siegel
davidsiegelbk@gmail.com

Registrants Served Through U.S. Mail:

Katrina West
2527 E. 76th St. #402
Chicago, IL 60649
&
45 E. 36th St.,
Chicago, IL 60653

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Motion for Relief from Stay

Movant, SSDF7 Portfolio 1 LLC (Landlord), by its attorney, Michelle Ronay, moves the Court to grant it relief from the automatic stay and in support of its motion pleads as follows:

1. Landlord, SSDF7 Portfolio 1 LLC was recently notified that a tenant of theirs by the name of Katrina L. West filed bankruptcy recently. Tenant resides at residential real property commonly known as 2527 E. 76th St, #402, Chicago, IL 60649, managed by Landlord.
2. On October 16, 2019, Debtor filed the present Chapter 13 bankruptcy case. The present Chapter 13 bankruptcy case lists tenant's address as 45 E. 36th St., Chicago, IL 60653. Landlord has reason to believe that Debtor resides at both 45 E 36th St, Chicago, IL 60653 and 2527 E. 76th St., #402, Chicago, IL 60649.
3. As of the date of this filing, Debtor will owe Landlord pre-petition rent at the residential real property of 2527 E. 76th St., #402, Chicago, IL 60649 for two month (\$1301.86) and post-petition rent for 1 month (\$878). As of the date this motion will be heard, Debtor will owe post-petition rent for two months (**\$1756 for November and December**).

WHEREFORE, Landlord, SSDF7 Portfolio 1 LLC by its attorney, Michelle Ronay, prays the Court grant an annulment of the automatic stay as to SSDF7 Portfolio 1 LLC (pursuant to section

362(d) of the United States Bankruptcy Code):

- a) Allow the landlord to not be restrained from pursuing non-bankruptcy remedies with respect to the real property commonly known as 2527 E. 76th St, #402, Chicago, IL 60649.
- b) Landlord may recover the residential real property commonly known as 2527 E. 76th St, #402, Chicago, IL 60649 and;
- c) The Rule 4001(a)(3) stay is waived and the Order granting relief from the automatic stay is immediately effective.

/s/ Michelle Ronay
Attorney for Movant
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